

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

IN THE MATTER OF

AMENDMENT OF PART 90 OF THE
COMMISSION'S RULES GOVERNING
EXTENDED IMPLEMENTATION PERIODS

PR DOCKET NO. 92-210

RM 7974

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TO: THE COMMISSION

COMMENTS OF EDS CORPORATION

EDS Corporation ("EDS"), by its attorneys, hereby files its comments on the Notice Of Proposed Rulemaking ("Notice") issued October 13, 1992 in the above-captioned proceeding. In the Notice, the Commission proposes to modify the rules governing "slow growth" private land mobile systems using frequencies above 800 MHz. See 47 C.F.R. §§ 90.629 and 90.631.

EDS is one of the world's leading providers of information technology services. EDS also is a major user of private land mobile radio services in its role of supplying the worldwide communications and information processing requirements of its parent company, General Motors Corporation ("GM"). EDS manages both General Motors Research Corporation ("GMRC"), which holds various FCC radio licenses on behalf of GM, and EDS Spectrum Corporation, which holds various FCC radio licenses on behalf of EDS and GM. Among the private land mobile systems managed by EDS is GMRC's 800 MHz 20-channel trunked system near Detroit, Michigan, a system which is one of the first, and perhaps the

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first, large-scale non-SMR 800 MHz trunked systems in operation. The GMRC system has been customized to meet the unique service requirements of a single, but diverse, user community consisting of numerous separate automotive manufacturing and assembly operations spread out over the Detroit, Pontiac, and Flint, Michigan area.

Based on GMRC's experience in constructing and loading its 20-channel trunked system, EDS supports the Commission's proposals to lengthen from three years to five years the possible time period for constructing and placing into operation large and complex communications systems. Ambitiously designed systems like GMRC's often confront difficult start-up problems resulting from the use of new technologies or new uses of existing technology. Additionally, licensees often must overcome unforeseen obstacles in transitioning their users from an existing communications system to the proposed new system, or in coordinating the operational needs of a diverse user community. In some cases, therefore, a five year "slow growth" period provides a more realistic amount of time for a licensee to implement the larger, more technically efficient communications systems being planned today. Moreover, the extension of the "slow growth" period from three to five years would be consistent with the Commission's decision to eliminate the three-year

loading requirement for 800 MHz systems and to rely solely on a five-year loading requirement.^{1/}

EDS also supports the Commission's proposal to eliminate the currently-effective annual reporting requirement for "slow growth" licensees, 47 C.F.R. § 90.629(b). This reporting requirement generates unnecessary paperwork and is not necessary to ensure compliance with the Commission's rules.

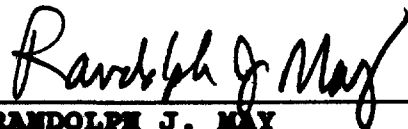
Finally, EDS supports in principle the proposal of the Utilities Telecommunications Council ("UTC") that utilities planning to convert a conventional system to a system using trunked technology be permitted to construct and place their system in operation under an extended implementation schedule. See Notice at 2 n.8. Such conversions of in-place systems from conventional to trunked technology must be planned and implemented carefully so as not to disrupt existing users and their specialized applications. Thus, licensees planning such conversions also would benefit from an extended implementation schedule. The benefit of UTC's proposal should not be restricted to utilities, however, but should be extended also to private land mobile licensees in the Business Radio and Industrial/Land Transportation categories.

^{1/} See Amendment of Part 69, Subparts M and S, of the Commission's Rules, 3 FCC Rcd 1838 (1988) (under currently-effective Section 90.631(b) of the Commission's rules, five-year loading requirements are applied for channel cancellation purposes only to trunked systems initially authorized before June 1, 1993).

For the foregoing reasons, EDS supports adoption of the Commission's proposed rule modifications applicable to "slow growth" private land mobile systems.

Respectfully submitted,

EDS CORPORATION

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